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KATHLEEN IMMEDIATO, individually and
as real party in interest to the ESTATE OF
RALPH IMMEDIATO

Plaintiff,

vs.

UNITED STATES OF AMERICA

Defendant.

CASE NO. CV 07-03008 MMC

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

TO THE ABOVE-ENTITLED COURT:

The parties, through their respective counsel, hereby advise this Court, and stipulate, as follows:

1.

1 1) On August 17, 2007, the Court issued a Case Management Scheduling Order for this case,
2 with an initial case management conference date of September 14, 2007 at 10:30 a.m.;

3 2) On August 29, 2007, Plaintiff Kathleen Immediato filed an Amended Complaint which
4 eliminated as a defendant the United States Department of Veteran Affairs and added as the sole
5 defendant to this matter, the United States of America;

6 3) Defendant United States of America has not been served or appeared in this case;

7 4) Plaintiff intends to serve Defendant United States of America with a summons and the
8 Amended Complaint no later than September 14, 2007;

9 5) The parties wish to meet and confer to resolve as many disputes as possible prior to the
10 Case Management Conference;

11 6) In light of the above, the parties respectfully request that this Court: (a) continue the
12 pending Case Management Conference to the next convenient date and time for the Court **after**
13 October 14, 2007, at which point Defendant United States of America will have been served and
14 should have answered or filed other responsive pleadings; (b) that all deadlines, including the need
15 for a joint case management statement and a rule 26 conference, run in accordance with this new
16 Case Management Conference date.

17
18 Dated: September 4, 2007

ADAMS | NYE | SINUNU | BRUNI | BECHT LLP

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20 By: _____/s/_____
MICHAEL SACHS
21 Attorneys for Plaintiff
KATHLEEN IMMEDIATO
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23
24 Dated: September 4, 2007


25
26 By: _____/s/_____
OWEN P. MARTIKAN
27 Attorneys for Federal Defendants
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1 ~~[PROPOSED]~~ ORDER CONTINUING CASE MANAGEMENT CONFERENCE

2
3 The parties having so stipulated and jointly requested the Court, and good cause appearing,

4 IT IS HEREBY ORDERED that the Case Management Conference, presently scheduled for
5 September 14, 2007 at 10:30 a.m., is continued to October 19, 2007 at 10:30 a.m.
6 and that all deadlines should run in accordance with this new case management conference date.

7 DATED: September 7, 2007

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9 HON. MAXINE M. CHESNEY
10 United States District Judge
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